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9 Attorneys for Plaintiffs MARKUS
HEITKOETTER and ROCKWELL
10 TRADING SERVICES, LLC

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13

14 MARKUS HEITKOETTER, an
individual and ROCKWELL
15 TRADING SERVICES, LLC, a Texas
limited liability company,

16 *Plaintiffs,*

17 vs.

18 KARL DOMM, an individual,

19 *Defendant.*
20

Case No. 1:22-cv-00368-AWI-BAM

Honorable Anthony W. Ishii

**STIPULATION TO CONTINUE
HEARING DATE FOR
DEFENDANT’S MOTION TO
DISMISS AND MOTION TO
STRIKE, AND TO EXTEND
PLAINTIFFS’ OPPOSITION AND
DEFENDANT’S REPLY
DEADLINES AND PROPOSED
ORDER**

Scheduling Conference: June 28, 2022

22
23 Pursuant to Local Rules 143, 144, and 230 Plaintiffs Markus Heitkoetter and
24 Rockwell Trading Services, LLC (“Plaintiffs”) and Defendant Karl Domm
25 (“Defendant”), by and through their respective counsel, hereby stipulate and
26 respectfully request the Court to continue the hearing date for Defendant’s Motion to
27 Dismiss and Motion to Strike from June 6, 2022 to June 27, 2022 and to extend
28

1 Plaintiffs' Opposition deadline from May 20, 2022 to June 10, 2022 and Defendant's
2 Reply deadline from May 31, 2022 to June 21, 2022.

3 Plaintiffs and Defendant, through their respective counsel, hereby stipulate and
4 agree as follows:

5 **Stipulation**

6 WHEREAS, Plaintiffs filed this action on March 29, 2022;

7 WHEREAS, Defendant filed his Motion to Dismiss and Special Motion to
8 Strike Plaintiffs' Complaint (collectively, "Motions") on May 6, 2022;

9 WHEREAS, Defendant's hearing date for his Motions is currently set for June
10 6, 2022 at 1:30 p.m.;

11 WHEREAS, Plaintiffs' current deadline to file their Opposition to Defendant's
12 Motions is May 20, 2022;

13 WHEREAS, Defendant's current deadline to file his Reply in Support of his
14 Motions is May 31, 2022;

15 WHEREAS, this is the parties' first request for an extension regarding the
16 Motions.

17 WHEREAS, the parties have agreed to continue the hearing date for
18 defendant's Motions to June 27, 2022 at 1:30 p.m.;

19 WHEREAS, the parties have agreed to extend Plaintiffs' deadline to file their
20 Opposition to Defendant's Motions to June 10, 2022;

21 WHEREAS, the parties have agreed to extend Defendant's deadline to file their
22 Reply in Support of their Motions to June 21, 2022;

23 WHEREAS, the parties request they be allowed to appear virtually should the
24 Court like oral argument on the Motions.

25 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendant that
26 the date for Defendant's Motions shall be continued from June 6, 2022 to June 27,
27 2022; Plaintiff's Opposition deadline shall be extended from May 20, 2022 to June
28 10, 2022; and Defendant's Reply deadline shall be extended from May 31, 2022 to

1 June 21, 2022.

2
3 Dated: May 17, 2022

VENABLE LLP

4
5 By: /s/ Max N. Wellman

6 Max N. Wellman

7 Vivian Martin

8 Attorneys for Plaintiffs

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10
11 Dated: May 13, 2022

MINC, LLC

12 By: /s/ Andrew C. Stebbins (as authorized
13 on 5/13/2022)

14 Andrew C. Stebbins

Attorneys for Plaintiffs

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16 Dated: May 14, 2022

17 By: /s/ Susanne Arani (as authorized on
18 5/14/2022)

19 Susanne Arani

20 Attorneys for Defendant

1 IT IS SO ORDERED.

2 Dated: May 17, 2022

3 
4 SENIOR DISTRICT JUDGE